

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

GENOVA BURNS LLC

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In re: LTL MANAGEMENT, LLC, ¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan Hearing Date: August 2, 2023, 10:00 a.m.
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NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS FOR ENTRY OF AN ORDER (I) ESTABLISHING A DEADLINE FOR FILING PROOFS OF CLAIM, (II) APPROVING THE PROPOSED MODEL CLAIM FORM FOR PERSONAL INJURY TALC CLAIMS AND RELATED PROCEDURES, AND (III) DIRECTING THE DEBTOR TO PROVIDE ADEQUATE NOTICE OF THE DEADLINE FOR FILING PROOFS OF CLAIM TO ALL TALC CLAIMANTS

PLEASE TAKE NOTICE, that *on August 2, 2023 at 10:00 a.m.*, the undersigned, as local bankruptcy counsel for the Official Committee of Talc Claimants (the “Committee”) of LTL Management LLC, (“LTL” or the “Debtor”), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, seeking the entry of the order submitted with this motion, and for such other relief that is just and proper.

PLEASE TAKE FURTHER NOTICE, that the undersigned shall rely upon the motion filed herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE, that oral argument is requested.

PLEASE TAKE FURTHER NOTICE, that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion.

PLEASE TAKE FURTHER NOTICE, that all objections must be in writing and filed at least seven (7) days prior to the hearing date, with the Clerk of the United States Bankruptcy Court,

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: July 12, 2023

Respectfully submitted,

GENOVA BURNS, LLC

By: /s/ Donald W. Clarke

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